

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION**

ANDREW “ANDY” THOMAS,)	
)	
PLAINTIFF,)	CASE NO.: 1:21-cv-2519-TWP-MJD
)	Judge Tanya Walton Pratt
v.)	Magistrate Judge Mark J. Dinsmore
)	
ooSHIRTS, INC. doing business)	
as www.teechip.com, et al.)	
)	
DEFENDANTS.)	

SUPPLEMENTAL JOINT REPORT ON THE STATUS OF DISCOVERY

Pursuant to the Court’s Minute Entry (Doc. 67), the parties by and through the undersigned counsel, hereby report on the status of discovery in this matter as follows:

I. Description of All Discovery Completed to Date

As of the date of this report, the parties have exchanged initial disclosures pursuant to Rule 26(a). Regarding Plaintiff’s First Set of Requests for Production, Defendant provided responses and some documents on December 22, 2022. Plaintiff contact Defendant to request a meet and confer, which the parties did on December 27, 2022, via telephone. At the request of Defendant, Plaintiff drafted and sent a letter detailing the deficiencies of the document production responses. Plaintiff provided a deadline of January 13, 2023, at 5:00 P.M. Central to supplement Defendant’s responses and withdraw its objections.

II. Discovery Presently Scheduled or Pending

As described above, Plaintiff is currently waiting on Defendant to cure the deficient responses to the First Set of Requests for Production. Plaintiff’s counsel understands that Ms. Milam had to take an emergency leave from her practice, and Ms. Rykovich is currently handling this matter on behalf of Defendant. Plaintiff has provided a deadline for Defendant to cure its

responses to the First Set of Requests for Production by January 13, 2023, by 5:00 P.M. Central. Mr. Maguire, on behalf of Plaintiff, is responsible for completing such discovery. Currently, Ms. Rykovich, on behalf of Defendant, is responsible for completing such discovery.

III. Discovery Disputes Still Pending

The discovery dispute regarding Plaintiff's First Set of Requests for Production is still pending. Mr. Maguire, on behalf of Plaintiff, is responsible for completing such discovery. Currently, Ms. Rykovich, on behalf of Defendant, is responsible for resolving this discovery dispute.

IV. Discovery that is Planned

Plaintiff still anticipates a further set of requests for production and interrogatories directed at Defendant. Plaintiff also anticipates requests for admission after he receives interrogatory and request for production responses. Plaintiff anticipates the deposition of Mr. Lei, Mr. Garcia, Mr. Huang, Mr. Wallraven, and Mai Tran. Mr. Maguire and Ms. Rykovich are responsible for completing discovery in this matter.

V. Discovery Remaining to be Completed

The parties have yet to complete written discovery and have yet to conduct depositions in this matter. Plaintiff anticipates the completion of written discovery by the end of February 2023. Mr. Maguire and Ms. Rykovich are responsible for completing discovery in this matter.

VI. Discovery Issues to be Brought to the Attention of the Court

The parties would like to bring to the attention of the Court, the current deadline of January 13, 2023, at 5:00 P.M. Central for Defendant to supplement its responses and withdraw its objections to Plaintiff's First Request for Production. Considering unexpected leave of Ms. Milam,

the parties desire to discuss the current deadline provided in Plaintiff's correspondence at the status conference and the authorization to file a motion to compel.

Approved and submitted by,

/s/ Oliver Maguire

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CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies that on this 9th day of January 2023, a copy of the foregoing was filed using the Court's CM/ECF system, which automatically sends notice to all counsel of record.

/s/ Oliver Maguire

Counsel for Plaintiff